

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

---

ALVIN BALDUS, ET AL.

Plaintiffs,

v.

Case No. 11-CV-562  
JPS-DPW-RMD

MEMBERS OF THE WISCONSIN  
GOVERNMENT ACCOUNTABILITY  
BOARD, ET AL.

Defendants,

---

**AFFIDAVIT OF P. SCOTT HASSETT**

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STATE OF WISCONSIN     )  
                                      ) SS  
COUNTY OF DANE         )

P. SCOTT HASSETT, being duly sworn on oath deposes and says:

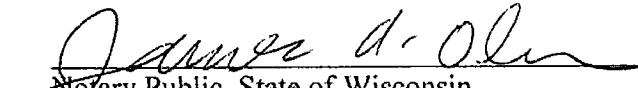
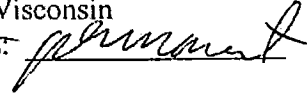
**BACKGROUND**

1. I am one of the attorneys for the Intervenor-Plaintiffs in the above case.
2. Attached as Exhibit 1 is a copy of the Wisconsin Congressional boundaries before the enactment of Act 44 in 2011.
3. Attached as Exhibit 2 is a copy of the Wisconsin Congressional boundaries after the enactment of Act 44 in 2011.
4. Attached as Exhibit 3 is an overlay of Exhibits 1 and 2 that depict the changes in the Congressional boundaries resulting from the enactment of Act 44 in 2011.
5. Attached as Exhibit 4 is an enlargement of exhibit 2 that relates to Marathon, Portage, and Wood Counties.

6. Exhibit 5 is an enlargement of a Wisconsin road map for the counties of Marathon, Portage and Wood Counties. Professor Randy Cray, a declared expert in this proceeding, has identified various features establishing a community of interest between these three counties and has appended a legend describing those features.
7. Exhibit 6 is the Rule 26 filing of the Defendants that was adopted by the Intervenor Defendants.

  
P. Scott Hassett

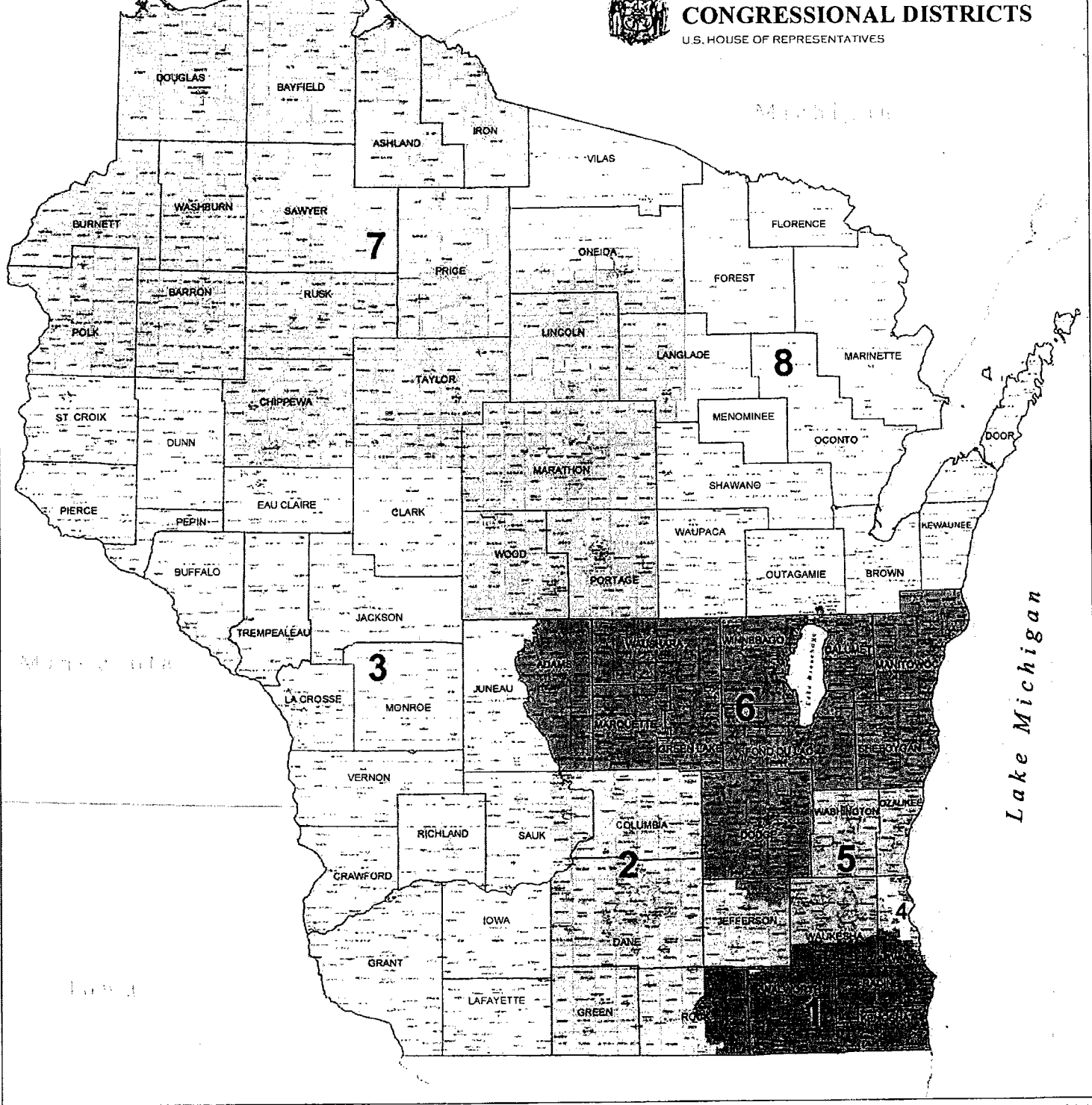
Signed and sworn before me  
this 3 day of January 2012.

  
Notary Public, State of Wisconsin  
My Commission Expires: 

Lake Superior



**STATE OF WISCONSIN  
CONGRESSIONAL DISTRICTS**  
U.S. HOUSE OF REPRESENTATIVES



Lake Michigan

Source: U.S. Census Bureau's 2000 data and 2001 data used to create a map of Wisconsin's congressional districts. These districts were used for the 2002 elections and are not intended to represent the boundaries of any political party. The map is for informational purposes only and is not intended to be used for any other purpose.

Disclaimer: All data is prepared in Wisconsin. The map is not intended to be used for any other purpose.

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For more information, please contact the Wisconsin Department of Transportation.



2011-2012 WISCONSIN MEMBERS OF THE U.S. HOUSE OF REPRESENTATIVES

- |                       |                                 |
|-----------------------|---------------------------------|
| Paul Ryan (1)         | F. James Sensenbrenner, Jr. (5) |
| Tammy Baldwin (2)     | Tom Petri (6)                   |
| Ron Kind (3)          | Sean Duffy (7)                  |
| Gwendolynne Moore (4) | Reid Ribble (8)                 |

**EXHIBIT**

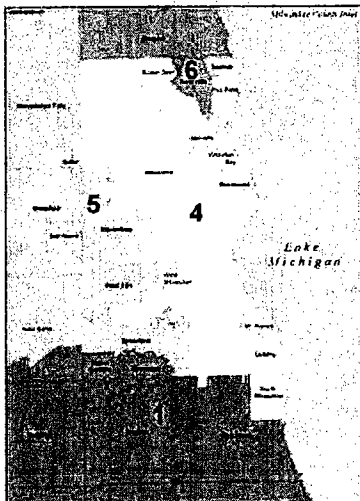
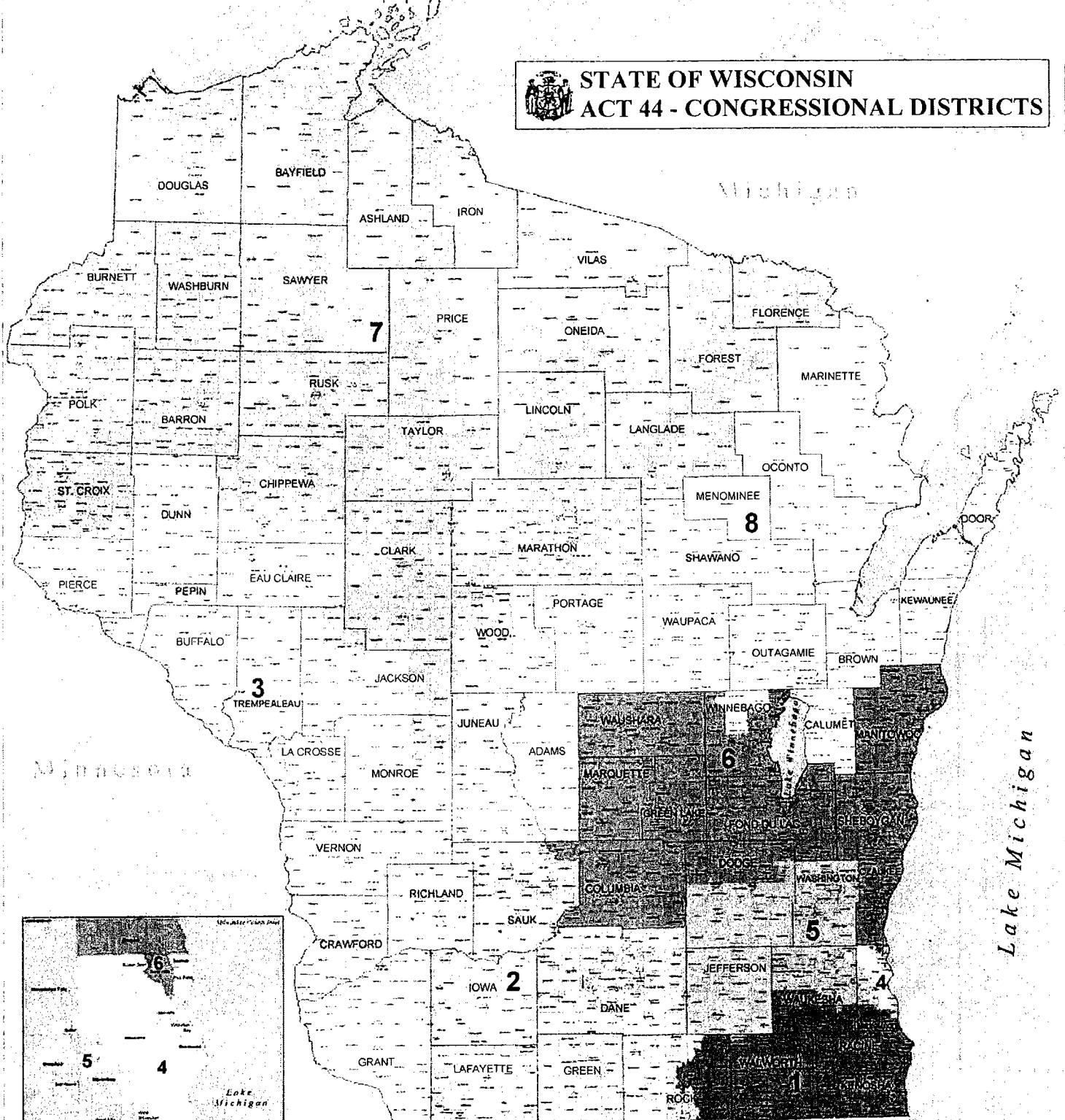
1

Lake Superior



STATE OF WISCONSIN

ACT 44 - CONGRESSIONAL DISTRICTS



Source: U.S. Census Bureau's TIGER 2010 data was used in the creation of these districts. The districts will be used for the fall of 2012 elections.

Proportion: All data is projected at Wisconsin's 2010 population as of the 2010 census, referenced to the 2010 American Census of 1990 adjustment.

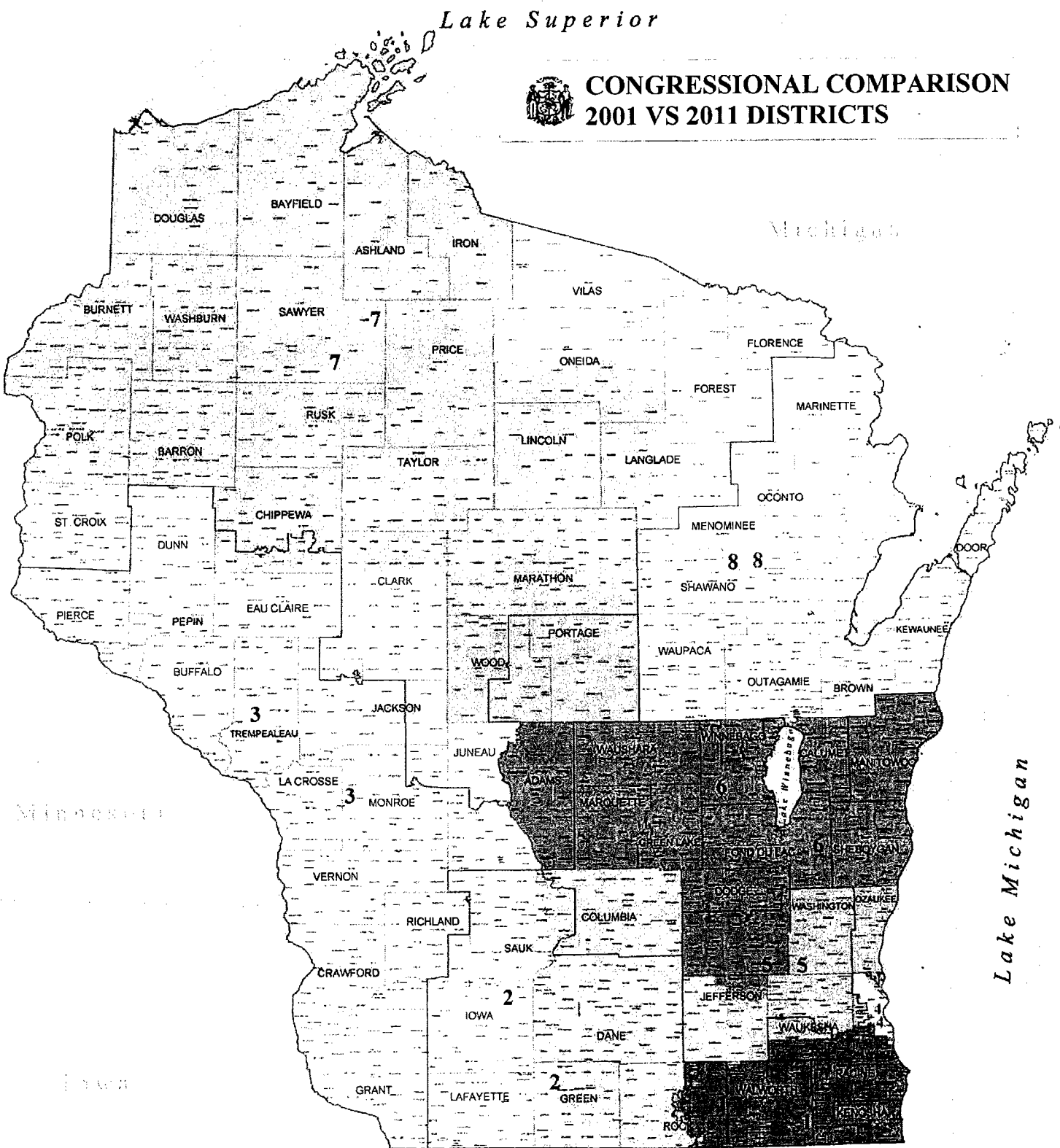
Legislative Technology Services Bureau  
17 West Main Street, Suite 200  
Madison, WI 53703-2305  
(608) 256-6640 Ext. 1

Website: <http://www.legis.wisconsin.gov/redistricting>

Lake Superior



# CONGRESSIONAL COMPARISON 2001 VS 2011 DISTRICTS



EXHIBIT

3

CLARK

Old 7<sup>th</sup>  
New 7<sup>th</sup>

MARATHON

Old and New 7<sup>th</sup>

PORTAGE

WOOD

7<sup>th</sup>

Wisconsin  
Rapid

Old 7<sup>th</sup>  
New 3<sup>rd</sup>

JACKSON

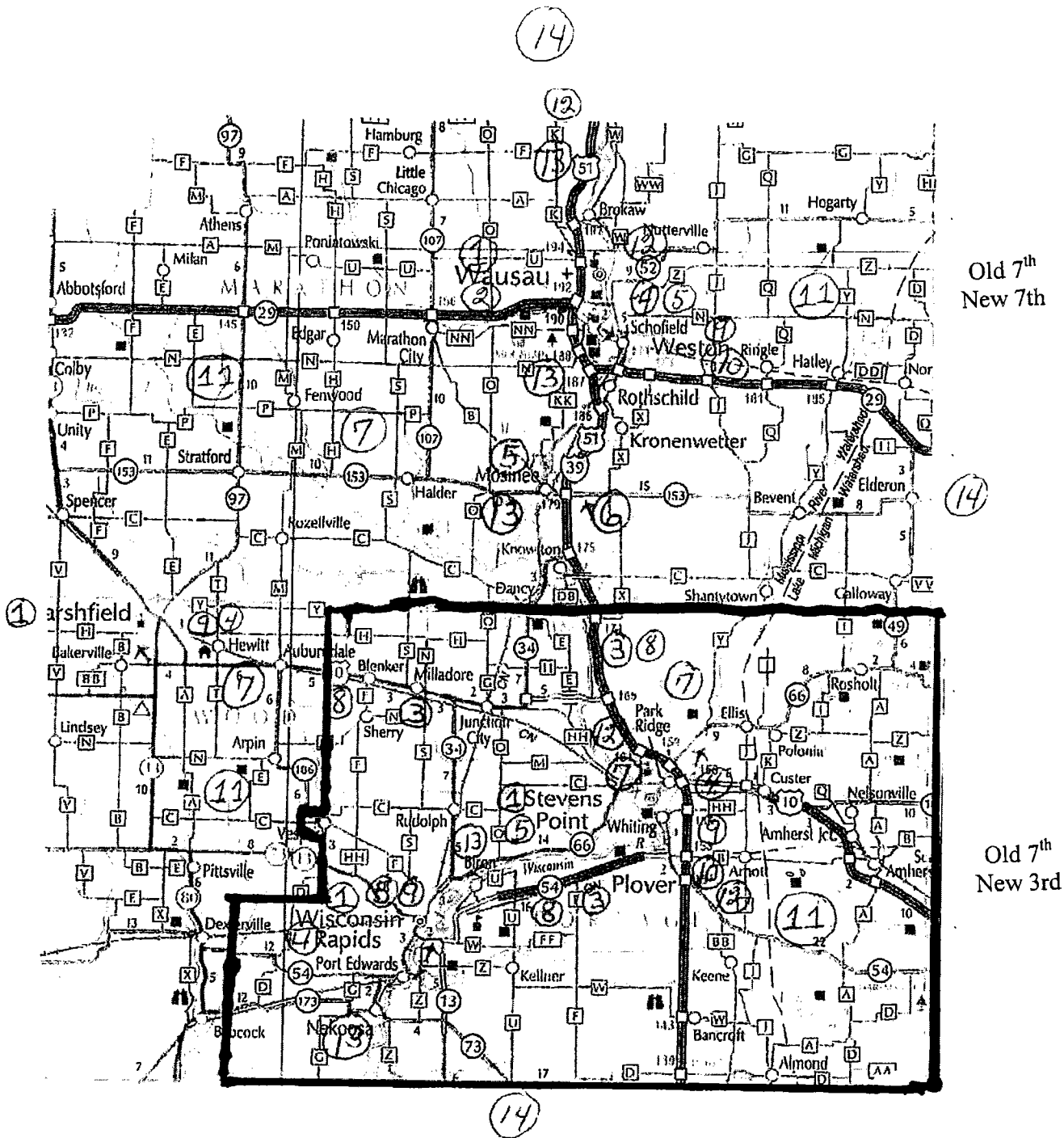
Old 3<sup>rd</sup>  
New 7<sup>th</sup>

JUNEAU

Old 3<sup>rd</sup>  
New 7<sup>th</sup>

tabbies

# Act 44 Boundary Changes in Ruralplex



EXHIBIT

5

#### Legend for Map of Central Wisconsin

1. Rural Plex of Central Wisconsin: Wausau, Stevens Point, Marshfield, and Wisconsin Rapids.
2. Centergy Inc. is an economic development organization located in Wausau that is supported by most of the economic development agencies in Central Wisconsin. Centergy, among many other things, lobbies on the behalf of Central Wisconsin's economic development.
3. The commuting patterns of workers suggest there is a common labor pool in the region.
4. Central Wisconsin is one television and radio market. The same ABC, CBS, NBC, FOX and Public Television affiliates serve the entire area. Gannett Newspapers owns all four local newspapers. Radio is basically the same story.
5. The Central Wisconsin area and communities have very strong ties to the paper industry.
6. The Central Wisconsin Regional Airport is a joint venture between Marathon and Portage counties.
7. Of Wisconsin's 72 counties, The University of Wisconsin Stevens Point draws a significant percentage (27% in 2010) of its students from Marathon, Portage and Wood Counties.
8. The Rural Plex of Central Wisconsin is connected by four lane highways and has short commute times.



9. The central Wisconsin Region has a highly integrated medical services sector. For example Ministry Health Care and Aspirus and their affiliates are major health care providers in our communities and are major employers in the region.
10. Wausau is the retail hub of Central Wisconsin. The Wausau Mall and the Rib Mountain shopping area draw heavily from the area population. The Crossroads Commons in Stevens Point-Plover also serves as a regional shopping area.
11. The agricultural base of our area is predicated on potatoes, green beans, ginseng, corn, cranberries and dairy/cheese production. Moreover, food manufacturing is a large employer in the area.
12. The insurance industry is highly concentrated in our Central Wisconsin, Sentry Insurance, Liberty Mutual, AIG Travel Guard, and Church Mutual (in Merrill) are all headquartered in our area and are some of our largest employers.
13. The Wisconsin Valley Improvement Corporation manages the Wisconsin River flowage in our area to ensure that community, recreation, and paper industry needs are fulfilled in our region.
14. Marathon, Portage and Wood counties are much more alike than the surrounding counties in terms of urbanization and employment levels.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

---

ALVIN BALDUS, CARLENE BECHEN, ELVIRA  
BUMPUS, RONALD BIENDSEIL, LESLIE W.  
DAVIS, III, BRETT ECKSTEIN, GLORIA  
ROGERS, RICHARD KRESBACH, ROCHELLE  
MOORE, AMY RISSEEUW, JUDY ROBSON,  
JEANNE SANCHEZ-BELL, CECELIA  
SCHLIEPP, TRAVIS THYSSEN, CINDY  
BARBERA, RON BOONE, VERA BOONE,  
EVANJELINA CLEERMAN, SHEILA  
COCHRAN, MAXINE HOUGH, CLARENCE  
JOHNSON, RICHARD LANGE, and GLADYS  
MANZANET,

Plaintiffs,

Case No. 11-CV-00562  
JPS-DPW-RMD

TAMMY BALDWIN, GWENDOLYNNE MOORE and  
RONALD KIND,

Inteviewer-Plaintiffs,

Members of the Wisconsin Government  
Accountability Board, each only in his official  
capacity: MICHAEL BRENNAN, DAVID  
DEININGER, GERALD NICHOL, THOMAS  
CANE, THOMAS BARLAND, and TIMOTHY  
VOCKE, and KEVIN KENNEDY, Director and  
General Counsel for the Wisconsin Government  
Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E.  
PETRI, PAUL D. RYAN, JR., REID J. RIBBLE,  
and SEAN P. DUFFY.

Inteviewer-Defendants.

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VOCES DE LA FRONTERA, INC.,  
RAMIRO VARA, OLGA VARA,



JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

v.

Case No. 11-CV-1011  
JPS-DPW-RMD

Members of the Wisconsin Government  
Accountability Board, each only in his official  
capacity: MICHAEL BRENNAN, DAVID  
DEININGER, GERALD NICHOL, THOMAS  
CANE, THOMAS BARLAND, TIMOTHY  
VOCKE, and KEVIN KENNEDY, Director  
and General Counsel for the Wisconsin  
Government Accountability Board,

Defendants.

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DEFENDANTS' AMENDED INITIAL RULE 26(a) DISCLOSURES

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NOW COME the defendants by their attorneys, J.B. Van Hollen, Attorney General, and Maria S. Lazar, Assistant Attorney General, and make the following amended initial disclosures pursuant to Fed. R. Civ. P. Rule 26(a)(1):

**A. Individuals potentially having knowledge that the defendants may use to support their claims or defenses.**

Defendants assert that the Government Accountability Board ("GAB") did not prepare, edit, or in any other way draft the redistricting maps for the new boundaries which were passed by the Legislature on July 19 and 20, 2011 and signed into law (2011 Wisconsin Acts 43 and 44) by the Governor on August 9, 2011. GAB and the individual defendants have been sued because of their statutory responsibility to implement the districts that are now the law of the State. The defendants had no communications with the Legislature, prior to the enactment of the new

redistricting maps on August 9, 2011, with respect to the boundaries of the new maps. Accordingly, the information and details provided in these Amended Initial Rule 26(a) Disclosures are preliminary and to the best of the defendants' knowledge at this time. Defendants may amend these Disclosures as more discovery is completed.

Based upon the foregoing, the defendants make the following amended initial disclosures in accordance with the Court's Scheduling Order dated November 14, 2011:

1. Defendant Kevin J. Kennedy (GAB Director and General Counsel)  
Government Accountability Board  
212 East Washington Avenue, 3rd Floor  
Madison, WI 53703  
(608) 266-8005

Implementation of new redistricting maps (2011 Wisconsin Acts 43 and 44), other election administration, including but not limited to, election process, deadlines, past elections and historical information.

2. Nathaniel E. Robinson (GAB Division Administrator, Elections Division)  
Government Accountability Board  
212 East Washington Avenue, 3rd Floor  
Madison, WI 53703  
(608) 266-8005

Implementation of new redistricting maps (2011 Wisconsin Acts 43 and 44), other election administration, including but not limited to, election process, deadlines, past elections and historical information.

3. Ross Hein  
Government Accountability Board  
212 East Washington Avenue, 3rd Floor  
Madison, WI 53703  
(608) 266-8005

Implementation of new redistricting maps (2011 Wisconsin Acts 43 and 44), other election administration, including but not limited to, election process, deadlines, and past elections.

4. Sarah Whitt  
Government Accountability Board  
212 East Washington Avenue, 3rd Floor  
Madison, WI 53703  
(608) 266-8005

Implementation of new redistricting maps (2011 Wisconsin Acts 43 and 44), other election administration, including but not limited to, election process, deadlines, and past elections.

5. David Grassel  
Government Accountability Board  
212 East Washington Avenue, 3rd Floor  
Madison, WI 53703  
(608) 266-8005

Implementation of new redistricting maps (2011 Wisconsin Acts 43 and 44), other election administration, including but not limited to, election process, deadlines, and past elections.

6. Ann Oberle  
Government Accountability Board  
212 East Washington Avenue, 3rd Floor  
Madison, WI 53703  
(608) 266-8005

Implementation of new redistricting maps (2011 Wisconsin Acts 43 and 44), other election administration, including but not limited to, election process, deadlines, and past elections.

7. David Meyer  
Government Accountability Board  
212 East Washington Avenue, 3rd Floor  
Madison, WI 53703  
(608) 266-8005

Implementation of new redistricting maps (2011 Wisconsin Acts 43 and 44), other election administration, including but not limited to, election process, deadlines, and past elections.

8. Ronald Keith Gaddie, factual and expert testimony  
Professor of Political Science  
The University of Oklahoma  
455 West Lindsey Street, Room 222  
Norman, OK 73019-2001  
(405) 325-4989

Professor Gaddie will provide testimony regarding the constitutional requirements of the legislative maps at issue including, but not limited to, contiguity, compactness, communities of interest, core district populations, population requirements, voting rights, municipal and county splits, pairings, potential disenfranchisement and the lack of impermissible political gerrymandering of districts.

9. Individuals from the Legislature or one of its agencies who can provide factual, population, census data and other historical information related to the constitutional requirements of legislative maps at issue.
10. Individuals from the Legislature, and/or its various bodies, or those individuals on the Legislature's behalf, who were involved in drawing the redistricting maps that were signed into law on August 9, 2011, including without limitation, those individuals who reviewed the 2010 decennial census and assisted in determining the appropriate, constitutional boundaries for the state and Congressional districts as memorialized in Acts 43 and 44:

Adam Foltz  
Room 211 West, State Capitol  
Madison, WI 53708  
(608) 266-3387

Tad Ottman  
Room 211 South, State Capitol  
Madison, WI 53708  
(608) 266-5660

Joe Handrick  
Reinhart, Boerner, Van Deuren, S.C.  
1000 North Water Street, Suite 1700  
Milwaukee, WI 53202  
(414) 298-1000

11. Individuals from the Legislature, and/or its various bodies, or those individuals on the Legislature's behalf, who were involved in reviewing census and population data from the 2010 decennial census to insure minimum population deviation for the new districts:

Adam Foltz  
Room 211 West, State Capitol  
Madison, WI 53708  
(608) 266-3387

Tad Ottman  
Room 211 South, State Capitol  
Madison, WI 53708  
(608) 266-5660

Joe Handrick  
Reinhart, Boerner, Van Deuren, S.C.  
1000 North Water Street, Suite 1700  
Milwaukee, WI 53202  
(414) 298-1000

12. Individuals from the Legislature, and/or its various bodies, or those individuals on the Legislature's behalf, who were involved in reviewing population and other data so as to preserve, to the extent possible and practicable, the core population of prior districts as well as communities of interest:

Adam Foltz  
Room 211 West, State Capitol  
Madison, WI 53708  
(608) 266-3387

Tad Ottman  
Room 211 South, State Capitol  
Madison, WI 53708  
(608) 266-5660

Joe Handrick  
Reinhart, Boerner, Van Deuren, S.C.  
1000 North Water Street, Suite 1700  
Milwaukee, WI 53202  
(414) 298-1000

13. Individuals from the Legislature, and/or its various bodies, or those individuals on the Legislature's behalf, who assisted the Legislature in insuring that the new redistricting maps, to the extent possible, kept wards and municipalities whole within legislative district boundaries and to the extent possible, recognized local government boundaries:

Adam Foltz  
Room 211 West, State Capitol  
Madison, WI 53708  
(608) 266-3387

Tad Ottman  
Room 211 South, State Capitol  
Madison, WI 53708  
(608) 266-5660

Joe Handrick  
Reinhart, Boerner, Van Deuren, S.C.  
1000 North Water Street, Suite 1700  
Milwaukee, WI 53202  
(414) 298-1000

14. Individuals from the Legislature, and/or its various bodies, or those individuals on the Legislature's behalf, who assisted the Legislature to insure that, if voters were shifted



from odd to even senate districts, they were not unnecessarily disenfranchised by being deprived of the opportunity to vote:

Adam Foltz  
Room 211 West, State Capitol  
Madison, WI 53708  
(608) 266-3387

Tad Ottman  
Room 211 South, State Capitol  
Madison, WI 53708  
(608) 266-5660

Joe Handrick  
Reinhart, Boerner, Van Deuren, S.C.  
1000 North Water Street, Suite 1700  
Milwaukee, WI 53202  
(414) 298-1000

15. Individuals from the Legislature, and/or its various bodies, or those individuals on the Legislature's behalf, who reviewed the 2010 decennial census data and the previous districting maps to insure that the new districts were as geographically compact as practicable:

Adam Foltz  
Room 211 West, State Capitol  
Madison, WI 53708  
(608) 266-3387

Tad Ottman  
Room 211 South, State Capitol  
Madison, WI 53708  
(608) 266-5660

Joe Handrick  
Reinhart, Boerner, Van Deuren, S.C.  
1000 North Water Street, Suite 1700  
Milwaukee, WI 53202  
(414) 298-1000

16. Individuals from the Legislature, and/or its various bodies, or those individuals on the Legislature's behalf, who assisted the Legislature to prevent unnecessary and unconstitutional voter dilution of minority voters:

Adam Foltz  
Room 211 West, State Capitol  
Madison, WI 53708  
(608) 266-3387

Tad Ottman  
Room 211 South, State Capitol  
Madison, WI 53708  
(608) 266-5660

Joe Handrick  
Reinhart, Boerner, Van Deuren, S.C.  
1000 North Water Street, Suite 1700  
Milwaukee, WI 53202  
(414) 298-1000

17. Individuals from the Legislature, and/or its various bodies, or those individuals on the Legislature's behalf, who assisted the Legislature to insure that the new districts reflected communities of interest:

Adam Foltz  
Room 211 West, State Capitol  
Madison, WI 53708  
(608) 266-3387

Tad Ottman  
Room 211 South, State Capitol  
Madison, WI 53708  
(608) 266-5660

Joe Handrick  
Reinhart, Boerner, Van Deuren, S.C.  
1000 North Water Street, Suite 1700  
Milwaukee, WI 53202  
(414) 298-1000

18. Individuals who reside in, or are familiar with, challenged districts and/or pre-existing districts with respect to facts about those districts that are relevant to the constitutionality of the new redistricting maps.
19. Experts retained on behalf of the Legislature, and/or its various bodies, who assisted in preparing the redistricting maps.
20. Experts retained, or to be retained, on behalf of the defendants who will assist in defending against the allegations in the Second Amended Complaint.

Ronald Keith Gaddie, factual and expert testimony  
Professor of Political Science  
The University of Oklahoma  
455 West Lindsey Street, Room 222  
Norman, OK 73019-2001  
(405) 325-4989

Professor Gaddie will provide testimony regarding the constitutional requirements of the legislative maps at issue including, but not limited to, contiguity, compactness, communities of interest, core district populations, population requirements, voting rights, municipal and county splits, pairings, potential disenfranchisement and the lack of impermissible political gerrymandering of districts.

21. Other individuals whose identity will become known through further discovery.

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), the parties are to provide “the name, and if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.” Accordingly, the names listed above consist of the individuals, presently known to the defendants, who the defendants may use to support their claims or defenses. *Gluck v. Ansett Australia Ltd.*, 204 F.R.D. 217 (D.D.C. 2001) (plaintiff challenging defendants 26(a) disclosures required to show

that defendant intended to use undisclosed individuals at trial); *A Traveler v. CSX Transp., Inc.*, No. 1:06-cv-56, 2006 WL 2051732 (July 20, 2006, N.D. Ind.). Federal Rule of Civil Procedure 26, 2000 Notes of Advisory Committee, ¶9 ("A party is no longer obligated to disclose witnesses or documents, whether favorable or unfavorable, that it does not intend to use. . . . As case preparation continues, a party must supplement its disclosures when it determines that it may use a witness or document that it did not previously intend to use."); *Crouse Cartage Co. v. Nat'l Warehouse Inv. Co.*, No IP02-0071-c-T/K, 2003 WL 21254617 (S.D. Ind. April 10, 2003) (challenge to 26(a) disclosures failed to clear "high hurdle" of demonstrating intent to use undisclosed witness).

Moreover, the matter at issue in this case is the constitutionality of Acts 43 and 44. Several of the individuals listed by the plaintiffs—aside from their expert—appear to be relevant only to the intent of the Legislature when it enacted these Acts. The Wisconsin State Supreme Court has expressly noted that legislative intent is determined by the language of a statute, not the subjective views of individual legislators who may have supported a bill. "It is the enacted law, not the unenacted intent, that is binding on the public." *State ex rel. Kalal v. Circuit Court*, 2004 WI 58, ¶ 44, 271 Wis. 2d 633, 681 N.W.2d 110. While there may be some inquiry into the action taken by the Legislature, "[g]overnmental action only fails rational basis scrutiny if no sound reason for the action can be hypothesized." *Board of Trustees v. Garrett*, 531 U.S. 356, 367 (2001). Finally, it is quite difficult, if not nearly impossible to determine legislative intent. *Edwards v. Aguillard*, 482 U.S. 578, 636-37 (1987) (J. Scalia, dissenting) ("discerning the subjective motivation of those enacting statutes is, to be honest, almost always an impossible task. The number of possible motivations, to begin with, is not binary, or indeed finite . . . To look for the sole purpose of even a single legislator is probably to look for something that does

not exist.”) Indeed, if the trial in this case will delve into subjective motivations, it will not be completed within the four days allotted. Therefore, some of the individuals identified in the plaintiffs’ Initial Disclosures are not relevant to this challenge, and, are appropriately not identified by the defendants.

**B. Potentially relevant documents.**

Defendants may use the following documents to support their defenses in this matter.

1. Documents in the possession of the GAB with respect to the implementation of the legislative maps at issue.
2. The approved legislative maps which were created (by the Legislature or the Courts) each decade from 1970 through 2002.
3. The decennial census from 1970 through 2010.
4. Documents which detail population growth and changes from 1970 through 2010, including, but not limited to, historical, minority-based, social, and other community of interest breakdowns.
5. Historical documents and information relating to the constitutional requirements for the legislative maps at issue, including, but not limited to, contiguity, compactness, communities of interest, core district populations, population requirements, voting rights, municipal and county splits, pairings, and potential disenfranchisement.
6. Documents in the possession of the Legislature, and/or its various bodies, that were utilized to draft the 2011 legislative maps at issue.
7. Expert reports and analysis, if any, in the possession of the Legislature, and/or its various bodies, that were utilized to draft the 2011 legislative maps at issue.

8. The defendants reserve the right to further supplement this response with any documents that become known through further discovery.

Any of the documents listed above which are in the possession of defendants will be made available for inspection by the other parties at a time and place mutually agreed upon by all parties. Any copies that are requested as a result of any inspection may be obtained at the expense of the requestor at the usual State copying rate.

**C. Calculation of damages.**

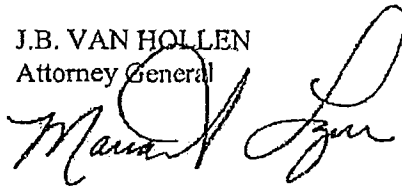
Monetary damages are not being sought in this action. Defendants reserve the right to present rebuttal evidence through their named fact and expert witnesses, as to any damages alleged by the plaintiffs.

**D. Insurance agreements.**

The State of Wisconsin is self-insured.

Dated this 25th day of November, 2011.

J.B. VAN HOLLEN  
Attorney General



MARIA S. LAZAR  
Assistant Attorney General  
State Bar #1017150

Attorneys for Defendants

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 267-3519  
(608) 267-2223 (fax)  
*lazarms@doj.state.wi.us*

**Brandt, Karen J (15243)**

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**From:** ecfmaster@wied.uscourts.gov  
**Sent:** Tuesday, January 03, 2012 2:40 PM  
**To:** ecfmaster@wied.uscourts.gov  
**Subject:** Activity in Case 2:11-cv-00562-JPS-DPW-RMD Baldus et al v. Brennan et al Affidavit

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**United States District Court**

**Eastern District of Wisconsin**

**Notice of Electronic Filing**

The following transaction was entered by Hassett, P on 1/3/2012 at 2:39 PM CST and filed on 1/3/2012

**Case Name:** Baldus et al v. Brennan et al  
**Case Number:** 2:11-cv-00562-JPS-DPW-RMD  
**Filer:**  
**Document Number:** 99

**Docket Text:**

**AFFIDAVIT of P. Scott Hassett . (Attachments: # (1) Exhibit Map - Congressional Districts, # (2) Exhibit Act 44 Congressional Districts, # (3) Exhibit Congressional Comparison 2001 vs. 2011 Districts, # (4) Exhibit Act 44 Boundary Changes - Counties, # (5) Exhibit Act 44 Boundary Changes in Ruralplex, # (6) Exhibit D's Amended Initial Rule 26(a) Disclosures)(Hassett, P)**

**2:11-cv-00562-JPS-DPW-RMD Notice has been electronically mailed to:**

Aaron H Kastens ahkastens@michaelbest.com, mlcrimmins@michaelbest.com

Brady C Williamson bwilliam@gklaw.com, agrote@gklaw.com, jschwartz@gklaw.com

Colleen E Fielkow cfielkow@reinhardtlaw.com, kkempski@reinhardtlaw.com

Daniel Kelly DKelly@reinhardtlaw.com, aschneik@reinhardtlaw.com

Daniel S Lenz dlenz@lawtoncates.com

Douglas M Poland dpoland@gklaw.com

Dustin B Brown dbrown@gklaw.com

ec437b1d37ba322d5edbdac4d3a576920bcaaa480647a87c75a3cbf5c1fc]]

**Document description:**Exhibit Act 44 Boundary Changes - Counties

**Original filename:**

**Electronic document Stamp:**

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**Document description:**Exhibit Act 44 Boundary Changes in Ruralplex

**Original filename:**

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1001523647 [Date=1/3/2012] [FileNumber=1810606-5]  
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**Document description:**Exhibit D's Amended Initial Rule 26(a) Disclosures

**Original filename:**

**Electronic document Stamp:**

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[9558e419582a9308c270aef86a7f906aa89fee9794863531bec57366bb72f6984235  
c25397cc4524a69c2196e634fb76fd43639d5342ee32d1672dde82927c4c]]